

March 14, 2007

Mr. Keith Roberson, P.G., PhD
Engineering Geologist
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

**Subject: Tentative Order for Revised Waste Discharge Requirements, Solano
Garbage Company Landfill, Suisun City, Solano County**

Dear Mr. Roberson:

Thank you for the opportunity to comment on the Tentative Order identified above. I have arranged my letter to address two issues: 1) groundwater flow and proposed sampling program frequency and 2) surface water compliance with the Basin Plan.

GROUDWATER AND SAMPLING FREQUENCY

The Solano Garbage Company Landfill is unlined (pg.2, SITE DESCRIPTION), located in the Suisun Marsh, and waste was placed to a maximum depth of about 12 feet, with the bottom waste now located in approximately 7 feet of groundwater (Pg. 2. Site Description - 6. Waste Placement and Pg. 4. Site Geologic and Hydrogeologic Setting).

During the wet season, groundwater flow is directed inward toward the landfill and the flow of groundwater is outward from the landfill in the dry season (Pg. 4, SITE GEOLOGIC AND HYDROGEOLOGIC SETTING). One might conclude that since there is more water in the landfill in winter, leachate and other pollutants will be diluted by the flooding of the landfill and leachate and other pollutants will be more concentrated during the summer and representative of the "worst case scenario, highest concentrations".

The proposed sampling schedule proposes a sampling frequency of semi-annual monitoring during the 2nd and 4th quarters, typically the wettest of the year when more groundwater is in the landfill and the Detection Monitoring Program proposes annual sampling for VOCs and General Water Quality Parameters and sampling once every 5 years in the 4th quarter for SVOCs, dissolved metals, additional metals, and 40 CFR 258 Appendix II constituents, also when more groundwater is in the landfill.

Recommendations:

I believe that the proposed sampling program is skewed towards the winter, more diluted condition within the landfill and the Marsh and summer sampling should also be required. The RWQCB needs data to be collected during the same month every year at the same location to determine the range of leachate and other constituent concentrations

that are being discharged into the Marsh annually due to the both the seasonal and tidal groundwater flow patterns into and out of the landfill.

Corrective Action Monitoring Program

I request that at a minimum, the Sampling Frequency be conducted semi-annually in the months of July and November to achieve the following:

- Sampling under both the dry and wet season groundwater flow regimes
- Track seasonal variation in tested parameters as concentration would be expected to vary with seasonal groundwater variations
- Establish consistent sampling months from year to year for the statistical comparison of data.

Detection Monitoring Program

I request that at a minimum, the Detection Monitoring Program Sampling Frequency be revised to semi-annually for VOCs and General Water Parameters and occur in the month of July and November to achieve the following:

- Sampling under both the dry and wet season groundwater flow regimes
- Track seasonal variation in tested parameters as concentration would be expected to vary with seasonal groundwater variations
- Establish consistent sampling months from year to year for the statistical comparison of data.

In addition, I request that at a minimum the Sampling Frequency for SVOCs, Dissolved Metals, Additional Metals, and 40 CFR 258 Appendix II constituents be conducted as follows:

Samples be taken once every year in July and November [beginning in July 2007 for 3 years (2010)]. Beginning in July 2011, the sampling frequency be reduced for the parameters that did not exceed the limits identified in Table 2 – Concentration Limits for Groundwater Solano Garbage Company Landfill during 2007-2010. For those parameters that exceed the Table 2 limits, annual sampling be continued in July and November to obtain sufficient analytical results for statistical analysis.

SURFACE WATER SAMPLING

According to the Tentative Order, "Surface runoff from the site discharges into Union Creek and Hill Slough, which discharge into Suisun Bay."

Recommendation:

I request that the Board direct staff to require the owner of the Solano Garbage Company Landfill obtain an NPDES Permit(s) to monitor the discharge of leachate and other

suspected pollutants into Union Creek and Hill Slough in order to determine compliance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) - see Page 7, 18 (d) of the Tentative Order.

Thank you for the opportunity to comment on the Tentative Order. If you have questions I can be reached at the following address, phone and fax numbers.

Sincerely,

June Guidotti & Family
Rubric

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Cc: Mr. Bruce Wolfe, Executive Officer, SFRWQCB